

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA,	§	
	§	
Plaintiff,	§	
vs.	§	
	§	Civil Action H-23-3819
KO CHUNG YEN,	§	
	§	
Defendant.	§	

PLAINTIFF'S RULE 26(a)(1) INITIAL DISCLOSURES

UNITED STATES OF AMERICA (“USA” or “Plaintiff”) provides the following initial disclosures under Federal Rule of Civil Procedure Rule 26 (a):

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information--along with the subjects of that information--that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment:

Disclosure:

1. **Ashleigh Edmonds, Financial Program Specialist for U.S. Department of the Treasury Bureau of the Fiscal Service through its counsel M. H. Cersonsky, Cersonsky & McAnelly, P.C., 1770 St. James Place, Suite 150, Houston, Texas 77056, phone 713-600-8500, email mhcersonsky@law-cmpc.com;**
2. **Ko Chung Yen.**

B. A copy--or a description by category and location--of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment:

Disclosure:

1. **FEMA letter dated May 20, 2019;**
2. **FEMA letter dated August 24, 2018;**
3. **Certificate of Indebtedness.**

Above documents are the Exhibits A, A1 and B attached to the Complaint.

C. A computation of each category of damages claimed by the disclosing party--who must also make available for inspection and copying as under Rule 34 the documents or other

evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

Disclosure: See Exhibit B attached to the Complaint, the Certificate of Indebtedness showing the Principal \$17,559.05; Interest (@1.00%) \$693.68; Penalty (@6.00%) \$3,351.13; Administrative Costs: \$7,8115.62 for a Total: \$29,419.48 as of March 22, 2023.

D. For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment:

Disclosure: N/A.

Respectfully Submitted,

CERSONSKY & MCANELLY, P.C.

By: /s/ M. H. Cersonsky
M. H. Cersonsky, TBN: 04048500
Email: mhcersonsky@law-cmpc.com
1770 St. James Place, Suite 150
Houston, Texas 77056
Telephone (713) 600-8500
Facsimile (713) 600-8585
ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on November 29th, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which has served the document on all CM/ECF participants, and I sent the foregoing to the non-CM/ECF participants in the manner indicated below:

Via CM/RRR: # 7019 1120 0000 2318 1639
and First Class U.S. Mail

Ko Chung Yen
12625 Memorial Dr., Unit 128
Houston, Texas 77024

/s/ M. H. Cersonsky
M. H. Cersonsky